

NS:AS/KDE/DR
F.#2018R00551

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

----- X

UNITED STATES OF AMERICA

- against -

AZAMAT BOBOMURODOV and
ZOKIR ISKANDEROV,

Defendants.

----- X

EASTERN DISTRICT OF NEW YORK, SS:

ALAN FOWLER, being duly sworn, deposes and states that he is a Special Agent with the Federal Bureau of Investigation, duly appointed according to law and acting as such.

In or about and between January 2018 and February 2018, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants AZAMAT BOBOMURODOV and ZOKIR ISKANDEROV, together with others, did knowingly and intentionally conspire to transport in interstate and foreign commerce certain goods, wares and merchandise valued at \$5,000 or more, to wit: electronic devices, knowing that said goods had been stolen, converted and taken by fraud, contrary to Title 18, United States Code, Section 2314.

In furtherance of the conspiracy and to effects its objects, within the Eastern District of New York and elsewhere, the defendants BOBOMURODOV and

**TO BE FILED UNDER
SEAL**

**AFFIDAVIT IN SUPPORT
OF ARREST WARRANTS**

(18 U.S.C. §§ 2314 and 371)

20-M-884

ISKANDEROV, together with others, did commit and cause to be committed, among others, the following overt acts:

(a) On or about January 28, 2020, ISKANDEROV, together with others, purchased approximately \$5,000 worth of electronic devices that were purported to be stolen for them to be smuggled from the United States to Russia;

(b) On or about February 7, 2020, BOBOMURODOV, together with others, paid a total of \$13,300 for electronic devices that were purported to be stolen for them to be smuggled from the United States to Russia.

(Title 18, United States Code, Section 371 and 3553 et seq.)

The source of your deponent's information and the grounds for his belief are as follows:¹

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been since 2016. I have been personally involved in the investigation of this matter. I am currently assigned to the FBI's Eurasian Organized Crime Task Force, where I have participated in investigations concerning organized crime and violent crime, among other offenses. During my time with the FBI, I have participated in investigations of racketeering enterprises, extortion, drug trafficking, and violent crimes, including robbery and, among other things, have conducted or participated in surveillance, the execution of search warrants, debriefings of informants, reviews of taped conversations, and have participated in investigations that included the interception of wire communications.

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

2. Beginning in approximately December 2017, the United States Customs and Border Protection (“CBP”) noticed a trend among Aeroflot Airlines crewmembers transporting numerous electronic devices from John F. Kennedy International Airport in Queens, New York (“JFK”) to destinations outside the United States including Moscow, Russia. Searches of these crew members revealed that they were transporting electronic devices such as Apple products, including iPhones, iPads, and Apple Watches. Based in part on this information, the FBI, together with, among others, CBP, the U.S. Department of Commerce, the U.S. Department of Homeland Security, Homeland Security Investigations and the New York City Police Department began investigating this activity.

I. Information provided by CS-1

3. The investigation has revealed that the defendants AZAMAT BOBOMURODOV and ZOKIR ISKANDEROV are part of the smuggling network described above.

4. For instance, a confidential source (“CS-1”²), whose identity is known to the affiant, has reported, in sum, substance and in part, that BOBOMURODOV and ISKANDEROV have purchased large amounts of electronic devices, including stolen merchandise, from various individuals located in the New York City metropolitan area so

² CS-1 is cooperating with the government in exchange for assistance with his immigration status and in the hope of receiving leniency at any criminal proceeding brought against him. CS-1’s criminal activities include, among other things, the illegal smuggling of goods from the United States to Russia without making required export filings and remaining in the United States on an expired visa. CS-1’s information has been reliable and corroborated by, among other things, statements made by others on consensual recordings, electronic records and physical surveillance.

that they may be smuggled out of the United States by couriers, typically Aeroflot Airlines employees, on flights from John F. Kennedy International Airport to Russia.

5. As set forth below, at the direction of law enforcement agents, CS-1 has sold to, among others, BOBOMURODOV and ISKANDEROV, electronic devices, which CS-1 told them were stolen,³ for those devices to be smuggled out of the United States to Russia.

II. The January 28, 2020 Meeting with ISKANDEROV

6. For instance, on or about January 28, 2020, CS-1, at the direction of law enforcement agents, arranged to meet with a co-conspirator (“CC-1”) to sell to CC-1 approximately \$5,000 worth of cellular telephones to be smuggled out of the United States to Russia. Although CS-1 expected to meet with CC-1, the defendant ZOKIR ISKANDEROV arrived instead and met with CS-1 in the vicinity of West 1st Street, Brooklyn, New York, which meeting was surveilled by law enforcement agents. Prior to the meeting, law enforcement agents searched CS-1 and confirmed he did not possess any cash or contraband on his person. Agents also provided CS-1 with the cellular telephones to be sold. During the meeting, which CS-1 consensually recorded at law enforcement agents’ direction, the following exchange took place, among others⁴:

CS-1: Yeah. What’s with your prices [UI⁵]?
 512 gigabyte [UI].

³ The electronic devices were in fact lawfully purchased by the FBI.

⁴ The recorded conversations described herein were conducted in Russian. The transcripts and translations of these conversations are set forth herein in draft, not final form, and are subject to revision.

⁵ “UI” is an abbreviation for “unintelligible.”

ISKANDEROV: Yes.

CS-1: Well, it's \$200 below retail.

ISKANDEROV: It's...well, it was them who told me to say it like this.

CS-1: Can you call them? I thought I was talking to [CC-1].

ISKANDEROV: [Chuckles] How many...eh...eh...For how much do you want to sell? So that I can tell him now.

CS-1: Can you call him now?

ISKANDEROV: Alright.

CS-1: I want to do it now. I thought I am talking to [CC-1].

7. At this point, ISKANDEROV placed a call on his cell phone to an individual identified as "Alex" and placed the phone on speakerphone:

[Phone rings]

ISKANDEROV: Do you have a 512 there right now?

CS-1: I'm being offered [it].

ISKANDEROV: Hello?

CS-1: Let me speak.

ISKANDEROV: Here, talk. [UI] Here, here...

CS-1: Hello?

Alex: Yes, yes. Hello.

CS-1: [CC-1]?

ISKANDEROV: No.

Alex: No, it's not [CC-1].

CS-1: [Another co-conspirator ("CC-2")]?

Alex: No, no. It's his friend.

ISKANDEROV: Right now they are in [UI], it's night time there right now.

CS-1: Ah! [UI] I wanted to discuss prices.

Alex: 512... You know it yourself, that they don't [UI]. [UI] it's always cheap.

CS-1: Well, give me a normal price and I will be bringing you quantities. Only thing is, the ones that I can bring in [bigger] quantities are clean [UI]...minus 50 dollars.

Alex: [UI] How much are you able to, just tell me.

CS-1: Ahm.

Alex: So that I know.

CS-1: Minus 50 from the store.

Alex: [UI] 512, minus 50 nobody will [UI]. You have sent it yourself and you know what the prices are.

CS-1: [UI] I'm looking for a buyer now who will give me good prices. If you allow me to make good money, I will...

Alex: Alright. Let's do this. Describe the new [UI] and he will give it to you. That's the way we will [UI]

CS-1: Well yes, I will give you good prices. These five phones are...[UI]

Alex: [UI] I will tell him and we will discuss, alright?

CS-1: These five, I bought them from the black [ones], they are the stolen ones. This is once in a while [opportunity], I can't give you these all the time.

Alex: Well, I don't know whether or not they are stolen. I'm buying them from you though.

CS-1: Well, what I mean is—

Alex: Well, [UI]....It doesn't matter to me how you got them.

CS-1: They are not clean ones. But if I am getting clean ones in [bigger] quantities – the price needs to reflect it.

Alex: Ok. Let me—

CS-1: The lowest price is minus 50.

Alex: I will double check and let you know. Ok?

ISKANDEROV: I will get his phone number so that—

CS-1: I just want to bring quantity.

Alex: I will give you a good price for a quantity.

CS-1: Clean ones.

ISKANDEROV: Yes.

CS-1: Ok. Alright then.

Alex: Alright.

ISKANDEROV: I will [UI] phone [UI]

CS-1: Mine?

ISKANDEROV: No, no. His. [UI] They are not here for now, while they are away, you can talk and deal with this person. If you get your hands on anything: iPhones, iPads [UI] or...

CS-1: Ah, ok. What's his number?

ISKANDEROV: [telephone number], yes...yes, Alex. Send him your number so that he knows as well. If you have a quantity [UI] put your price and send it to him.

CS-1: Yes, but for a quantity I need a good price.

ISKANDEROV: Yes. Yes. Will do. Alright?

CS-1: Sometimes the black [guy] brings me it, it's cheap. I will give everything to you for 800 apiece.

ISKANDEROV: Good. [UI]

CS-1: [UI] I don't know where he steals it from.

[Sound of money being counted]

ISKANDEROV: Four thousand five hundred. [UI]

CS-1: [UI]

ISKANDEROV: [UI] that's it, right? [UI] you get something, send the prices to this number, ok? Or send it to me.

CS-1: Alright.

ISKANDEROV: Quantity.

CS-1: Yes.

ISKANDEROV: Yes?

CS-1: Good.

ISKANDEROV: Good. Thanks. It was nice to meet you.

CS-1: What's the name?

ISKANDEROV: Me? Zokir.

CS-1: Zokir. Nice to meet you.

ISKANDEROV: I'll see you, right?

CS-1: Yes.

8. After this meeting, law enforcement officers met with CS-1 and recovered \$4,500 in cash from CS-1. CS-1 stated, in sum, substance and in part, that CS-1 gave the cellular telephones to the defendant ZOKIR ISKANDEROV, who took money from his pocket and paid CS-1 \$4,500 for the five phones.

III. The February 7, 2020 Meeting with BOBOMURODOV

9. CS-1 also met with the defendant AZAMAT BOBOMURODOV at law enforcement agents' direction on February 7, 2020 to sell BOBOMURODOV approximately \$14,500 worth of electronic devices, including cellular telephones and Apple iPads, to be smuggled out of the United States to Russia. While CS-1 was in the vicinity of BOBOMURODOV's residence waiting for him to arrive, CS-1 received a call from another co-conspirator ("CC-3"), a Russian national who, based on, among other things, information provided by CS-1, I know arranges for the acquisition of millions of dollars' worth of electronics, including stolen merchandise, and arranges for them to be smuggled from the United States to Russia for resale. During the call with CC-3, which CS-1 consensually recorded at law enforcement agents' direction, CS-1 stated that the cellular telephones to be

sold to BOBOMURODOV were stolen, which CC-3 stated he understood. Also during the call, CS-1 provided CC-3 with the International Mobile Equipment Identity numbers⁶ of the devices to be sold.

10. Shortly after CS-1's call with CC-3, the defendant AZAMAT BOBOMURODOV arrived and met with CS-1 in the vicinity of Avenue P in Brooklyn, New York, which meeting was surveilled by law enforcement agents. Prior to the meeting, law enforcement agents searched CS-1 and confirmed he did not possess any contraband and only had \$20 in cash on his person. Agents also provided CS-1 with the electronic devices to be delivered to BOBOMURODOV. During the meeting, which CS-1 consensually recorded at law enforcement agents' direction, the following exchange took place, among others:

CS-1: [UI] I understand. [UI] I have to receive money for the product.

BOBOMURODOV: Yes.

CS-1: So what? When will he be here?

BOBOMURODOV: Who?

CS-1: Your friend.

BOBOMURODOV: Five minutes.

CS-1: [UI] two iPads and 14 phones.

BOBOMURODOV: [UI]...let me give you 300. This is 300. Three thousand from there. [UI] as you want....if you don't trust me, in an hour [UI]

⁶ Based on my training, experience and involvement in the investigation, I know that IMEI numbers are unique identifiers assigned to certain electronic devices.

...

CS-1: I sent the serials to [CC-3].

BOBOMURODOV: Ah, you've sent it. [UI]

CS-1: Yes.

BOBOMURODOV: Are there no phones yet for sale?

CS-1: There will be.

BOBOMURODOV: Are there any [UI]? The ladies want [UI]

CS-1: No, right now that is all there is. There will be 30 more phones.

BOBOMURODOV: 30?

CS-1: Yes.

BOBOMURODOV: Are there any [iPhone] Pro Max, 256?

CS-1: No, they will be the same.

BOBOMURODOV: 64, right?

CS-1: Yes. Only 64. But I can order.

BOBOMURODOV: Ah. How much is Pro Max? It's for my girl. She wants it. [Mumbling] Pro Max 256.

CS-1: Pro Max 256 – 1,250 is retail. Do you specifically want a new one?

BOBOMURODOV: A new one. A new one.

...

CS-1: So you need a new iPhone, right? Just like these?

BOBOMURODOV: Yes. [UI]

CS-1: [UI] What color do you need?

BOBOMURODOV: Well, probably green.

CS-1: Will she use it here or over there?

BOBOMURODOV: She is over there. I buy it here and [she] uses it there.

CS-1: Because I have someone. Do you need it at a cheaper price or...

BOBOMURODOV: If it's used over there, then it will be cheaper?

CS-1: Yes.

BOBOMURODOV: How much will it cost?

CS-1: I have a supplier, he steals them.

BOBOMURODOV: I understand that.

CS-1: But it will be one thousand dollars, but you can't use it here.

BOBOMURODOV: [UI]

CS-1: Because [UI] it will be blacklisted.

BOBOMURODOV: Ah! I'll ask.


CS-1: But it's the cheapest version.

11. After this meeting, CS-1 met with two other co-conspirators ("CC-4" and "CC-5"), who paid CS-1 the remaining amount of money owed from the sale of the electronic devices to BOBOMURODOV set forth above. After these meetings, law enforcement officers met with CS-1 and recovered a total of \$13,300 in cash from CS-1. CS-1 stated, in sum, substance and in part, that the defendant AZAMAT BOBOMURODOV paid CS-1 \$5,300 for the devices CS-1 represented were stolen, which CS-1 gave to

BOBOMURODOV. CS-1 also stated that CC-4 paid CS-1 \$5,000 in cash and CC-5 paid CS-1 \$3,000 in cash to complete the payment for the devices that CS-1 provided to BOBOMURODOV.


12. Because the defendants AZAMAT BOBOMURODOV and ZOKIR ISKANDEROV are currently at liberty, it is respectfully requested that this Court issue an order sealing, until further order of the Court, all papers submitted in support of this application, including the application and arrest warrants, as disclosure would give the targets of the investigation an opportunity to destroy evidence, harm or threaten witnesses, change patterns of behavior, notify confederates and flee from or evade prosecution and therefore have a significant and negative impact on the continuing investigation and may severely jeopardize its effectiveness.

WHEREFORE, your deponent respectfully requests that arrest warrants be issued for the defendants AZAMAT BOBOMURODOV and ZOKIR ISKANDEROV so they may be dealt with according to law.



ALAN FOWLER
Special Agent
Federal Bureau of Investigation

Sworn to before me by telephone this
30 day of September, 2020



THE HONORABLE LOIS BLOOM
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK